

Data Requirements Review Boards and Their Importance

David Adams



It's a fact. Every day we are inundated with data coming at us from all directions—from work and family—via the electronic gadgets we carry with us and our stationary computers. Data overload can be a problem, but in contracting between government and industry, it should be and needs to be manageable.

There are different categories of data: technical data, which are recorded technical or scientific information (not including computer software), and contractual or financial and administrative data.

Data are ordered and procured using the DoD Directives Division Form 1423 Contracts Data Requirements List (CDRL). Technical data and Computer Software have two specific Defense Federal Acquisition Regulation Supplement (DFARS) clauses that should be inserted in the contract. These two clauses are Deferred Delivery of Technical Data and Computer Software (DFARS 252.227-7026) and Deferred Ordering of Technical Data or Computer Software (DFARS 252.227-7027).

Deferred Delivery gives the government the right to require at any time during the performance of this contract, within two (2) years after either acceptance of all items (other than data or computer software) to be delivered under this contract or termination of this contract, whichever is later, delivery of any technical data or computer software

Adams is deputy program manager for Configuration and Data Management at Naval Air Systems Command, Tactical Airlift Program Office (PMA-207). He has the configuration and data management oversight for seven aviation platforms, including all the U.S. Navy and Marine Corps commercial derivative aircraft and the K/C-130 extended range refueling aircraft. He holds a Bachelor of Science degree in economics from Frostburg State University in Maryland and a master's certification in enterprise configuration management from the University of Houston. He is Level III certified in Program Management.

The Main Functions of a Data Requirements Review Board

- Review all deliverable data requirements, ensuring that the intended users of the data are in agreement with the needs and requirements of the proposed acquisition and that the requirements conform to the applicable clauses of the Federal Acquisition Regulation (FAR) and the Defense Federal Acquisition Regulation Supplement (DFARS).
- Ensure that only the essential data in the most economical form is requested and defined; approval authority defined, if required; requirements and delivery dates defined; and deferred ordering or delivery of data are reasonable, consistent with the program's schedule, and have been properly documented on DD Form 1423 (CDRL form).
- Ensure adequate quality assurance data and/or warranty provisions have been identified in the contract schedule to guarantee that data produced and delivered shall meet its intended use.
- Ensure all data item descriptions (DIDs) referenced on the DD Form 1423 are listed in Acquisition Streamlining and Standardization Information System (ASSIST), or are newly approved one-time DIDs, appropriately tailored for contract application.
- Ensure all requirements for the format, content, preparation, media and delivery of the data either are referenced in the contract solicitation or on the DD Form 1423 to permit pricing.
- Ensure all data requirements are traceable to the contract reference in Block 5 of the DD Form 1423.
- Ensure all significant changes to DD Form 1423 are reviewed and approved.

item identified in this contract as "deferred delivery" data or computer software.

... Deferred Ordering gives the government the right to require, at any time during the performance of this contract or within a period of three (3) years after acceptance of all items (other than technical data or computer software) to be delivered under this contract or the termination of this contract, order any technical data or computer software generated in the performance of this contract or any subcontract hereunder.

On top of that, there is the topic of technical data rights both in noncommercial technical data (DFARS 252.227-7013) and commercial technical data rights (DFARS 252.227-7015). Data rights and Distribution Statements all must be considered when ordering data. It is highly recommended that these two DFARS clauses be studied and well understood along with DoD Instruction 5230.24 Distribution Statements on Technical Documents. The program's legal representative should understand these well, but it is essential that CDRL writers and data managers also understand them.

With all this information, the question becomes: How do we make it more manageable yet attain the data that we require in the form that we can use?

The optimal word is "require." We should not procure data that the government has no intention of using on current or future contracts. We only need to procure data that the government must have in order to manage the contract and the program as a whole. For data that is "nice to have," the government within the Statement of Work or Performance Work Statement, hereafter referred to as Work Statements, can have it stated that the government needs access to certain data that the contractor(s) need to accomplish. The trick is to determine if the data need to be procured or if it is enough to merely have access to the data. This sometimes is easier said than done.

Controlling the Data

Data Requirement Review Boards (DRRBs) are used to control the data requirements of a contract solicitation.

Naval Air Systems Command (NAVAIR), at Patuxent River, Maryland, previously held a centralized review board that all Program Management Airs (PMAs) utilized to present their data requirements, but was later eliminated, leaving the PMAs to manage their own processes for data reviews. Over time and with the transition of workforce, the basic knowledge of how to apply data management to contracts went by the wayside.

Some PMAs ended up just reviewing the CDRLs for accuracy. The Work Statement and the Procurement Initiation Document (PID) were not reviewed and vetted. This presented a problem because all the documents tied into one another—so if one was incorrect, it usually affected the others.

Having worked in Tactical Airlift Program Office (PMA-207) for several years, I was tasked to initiate and standardize the configuration management policies and processes within our office. This task took almost 2 years. Once it was completed, I was asked to tackle data management. In hindsight, this actually was more challenging than having the configuration management processes and policies put in place and followed. PMA-207 at the time had nine different platforms along with Contracted Air Services (CAS). Each team created its Work Statements and CDRLs differently and not necessarily in accordance with applicable policies and guidance documents.

Here are the steps that I found needed to be taken:

Obtain a Good Data Management Tool: We gained access to a good data management and CDRL tool from another program office, populated it with the appropriate people, role mapped and launched it to all users to begin learning. That took approximately one month to accomplish.

Prepare Well-Written Work Statements: Over a 3-year period, we standardized the Work Statements practices as

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stated in *Military Handbook 245D*. We realized that without well-written Work Statements, the CDRL package was of little value. Therefore, conducting a DRRB on just the CDRLs also was of little value.

Teaching the program office personnel how to draft well-written Work Statements was not easy. PMA-207 has many Integrated Product Teams (IPTs), so it was a reiterative process that took a while to accomplish. In my opinion, writing a Work Statement is a science and an art. I also believe it is the most important document we create in the program office. It cannot be emphasized enough that reading the *DoD Handbook for Preparation of Statement of Work* multiple times and going to the workshops on this subject that are offered by the Defense Acquisition University are necessary if one is to learn how to write a good Work Statement.

It was recommended that the Integrated Product Team Leads (IPTL) develop Work Statements in a group forum. The goal is to produce an organized and legible document with little to no ambiguity for both the acquirer and the supplier, resulting in very little risk for both parties. This can be difficult, but it is best to do it as a working group. Nobody knows every single task and requirement for the contractor to accomplish. Nobody!

Create a Diverse DRRB of Subject-Matter Experts: After emphasizing the importance of writing a standardized Work Statement, we need to establish a DRRB made up of experienced leads in our program office.

It is very important that the board membership is diverse and includes subject-matter experts in all fields. The board should have representatives from engineering, logistics, contracts, legal, business finance, test, and program management. A chair and vice chair are required along with a secretary to perform administrative tasks. This process is documented in the DRRB charter, which establishes the board members and the particular functions of these boards. Conducting DRRBs is required for all contracting actions that are greater than \$10 million, in accordance with NAVAIR Instruction 4200.21E. PMA-207 conducts them for every contracting action that has a Work Statement, no matter the estimated value.

Review PID Packages: After conducting a few more DRRBs, we realized the need to review not only the Work Statements and CDRL packages, but also the PID package. In particular, Sections B and C were reviewed to ensure the contract line item number (CLIN) structure matched the tasks being written in the requirements section of the Work Statement. One

change to the Work Statement can throw the other documents off. A change in the type of contract can change the Work Statement. Sections D through I also are reviewed to ensure accuracy and that contract clauses don't contradict the Work Statement.

Conducting DRRB Reviews

Today in PMA-207, the PID package, the Work Statement, and the CDRL package with a quick look at the request-for-proposal letter are all reviewed and corrected during the DRRB so it is more of an RFP review minus Sections L and M. PMA-207's process for conducting DRRBs is a good balance between the Naval Air Systems Command's previous centralized board and the other extreme of having no board at all.

It is true that DRRBs can take a bit of time, can be tedious, and can incite some differing opinions, but, in the end, the integrated product team and the DRRB board members better understand the task and data requirements, and a good product is released for the contractor(s) to understand and bid to. It also helps the program lawyers understand the requirements so that, when it comes time for the legal review board, they have the background to answer any questions that may arise.

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The author can be contacted at david.a.adams@navy.mil.

References for This Article and Other Useful Sources

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DoDI 5230.24—Distribution Statements on Technical Documents

MIL-STD-881C—Work Breakdown Structure

MIL-STD-963B—DoD Standard Practice Data Item Descriptions (DIDs)

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